

GARMAN TURNER GORDON LLP  
ERIKA PIKE TURNER  
Nevada Bar No. 6454  
Email: eturner@gtg.legal  
7251 Amigo Street, Suite 210  
Las Vegas, Nevada 89119  
Tel: (725) 777-3000  
Fax: (725) 777-3112  
*Attorneys for Defendant, Jody Marie Cuomo  
and Non-Party, Frank P. Silver, MD*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GREGORY KELLY, an individual;

Plaintiff,

v.

JODY MARIE CUOMO, an individual;

Defendant.

Case No. 2:18-CV-00923-JAD-MDC

**MOTION TO WITHDRAW AS  
COUNSEL OF RECORD**

Pursuant to Local Rule LR IA 11-6(b), the law firm of GARMAN TURNER GORDON LLP (“GTG”), counsel for Defendant, Jody Marie Cuomo (“Ms. Cuomo”), hereby re-submits its Motion to Withdraw as Counsel for Ms. Cuomo (“Motion”). This Motion is made and based upon the following Memorandum of Points and Authorities, the Declaration of Erika Pike Turner, Esq., attached hereto as **Exhibit A**, the papers and pleadings in this case, and any oral argument that may be heard by this Court.

**MEMORANDUM OF POINTS AND AUTHORITIES**

There are four (4) factors the court will consider when ruling on the Motion:

- 1) the reasons why withdrawal is sought;
- 2) the prejudice withdrawal may cause to other litigants;
- 3) the harm withdrawal might cause to the administration of justice; and
- 4) the degree to which withdrawal will delay the resolution of the case.

*Castillo v. W. Range Ass’n*, No. 3:16-cv-00237-RCJ-CLB, 2024 U.S. Dist. LEXIS 60553, at \*5 (D.Nev. Mar. 29, 2024).

As demonstrated by the attached declaration of counsel, good cause exists for this court to

1 grant GTG leave to withdraw as counsel for Ms. Cuomo.

2 1) The reasons why withdrawal is sought: Withdrawal is sought because Plaintiff Gregory  
3 Kelly ("Mr. Kelly") has so multiplied the proceedings in recent years, Ms. Cuomo can  
4 no longer afford to pay for GTG's services.

5 2) The prejudice withdrawal may cause to Mr. Kelly, the harm withdrawal may cause to  
6 the administration of justice and the degree to which withdrawal will delay the  
7 resolution of the case: There are no pending hearings or trial. Pursuant to the court's  
8 order [ECF No. 145] compelling the production of certain additional information from  
9 Ms. Cuomo, on June 9, 2025, a supplemental production was made to Mr. Kelly. A  
10 notice of compliance with the court's order was filed on June 9, 2025 [ECF No. 146].  
11 There are consequently no outstanding discovery requests or disputes.

12 Based on the foregoing, withdrawal under the circumstances is justified, and, pursuant to  
13 LR IA 11-6(b), GTG respectfully requests that this Court grant its Motion to Withdraw as Counsel  
14 for Ms. Cuomo.

15 Dated this 9<sup>th</sup> day of June, 2025.

16 GARMAN TURNER GORDON LLP

17 /s/ Erika Pike Turner

18 ERIKA PIKE TURNER

19 Nevada Bar No. 6454

20 7251 Amigo Street, Suite 210

21 Las Vegas, NV 89119

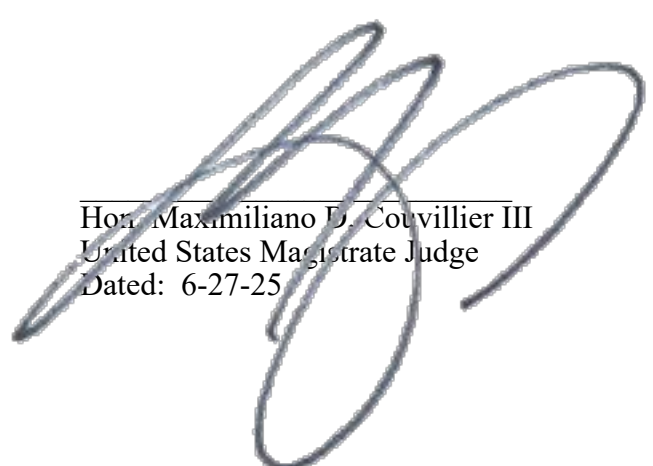
22 *Attorneys for Defendant, Jody Marie Cuomo*  
23 *and Non-Party, Frank P. Silver, MD*

24 **IT IS SO ORDERED.** The  
25 Motion is granted.

26 Hon. Maximiliano B. Couvillier III

27 United States Magistrate Judge

28 Dated: 6-27-25



**CERTIFICATE OF SERVICE**

The undersigned, an employee of Garman Turner Gordon LLP, hereby certifies that on the 9<sup>th</sup> day of June 2025, he caused a copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL OF RECORD**, to be served electronically to all parties of interest through the Court's CM/ECF system as follows:

Gregory Kelly  
3915 W. Davis St. Ste. 130, #135  
Conroe, TX 77304  
Email: [gkcollects@gmail.com](mailto:gkcollects@gmail.com)  
*Plaintiff In Proper Person*

A copy is also being sent via U.S. mail, certified mail and email to Ms. Cuomo's last known address and email address:

Jody Cuomo  
201 Rosemary Lane  
Las Vegas, NV 89107  
Email: [Jodicuomo07@yahoo.com](mailto:Jodicuomo07@yahoo.com)

/s/ Max Erwin

An employee of  
GARMAN TURNER GORDON LLP